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Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

In re:

AMMON EDWARD BUNDY,
Debtor.

Bankruptcy No. 24-23530
Chapter 7
Honorable William T. Thurman

## **AMENDED** NOTICE OF ST. LUKE'S CREDITORS':

(A) MOTION TO COMPEL RYAN BUNDY'S AND BUNDY MOTORS COMPANY'S COMPLIANCE WITH RULE 2004 SUBPOENAS FOR EXAMINATIONS AND PRODUCTION OF DOCUMENTS [DKT. 414]; AND

(B) SECOND MOTION TO COMPEL DEBTOR'S COMPLIANCE WITH RULE 2004 SUBPOENA FOR EXAMINATION AND PRODUCTION OF DOCUMENTS [DKT. 424]

## **AMENDED** NOTICE OF HEARING

(OBJECTION DEADLINE: MONDAY, JUNE 23, 2025)

(HEARING DATE: WEDNESDAY JULY 2, 2025 AT 3:00 P.M. MOUNTAIN TIME)

PLEASE TAKE NOTICE that the St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, "St. Luke's Creditors"), by and through their counsel, Holland & Hart LLP, have filed with the United States Bankruptcy Court of the District of Utah:

- (A) a Motion to Compel Ryan Bundy's and Bundy Motors Company's Compliance with Rule 2004 Subpoenas for Examinations and Production of Documents (the "**Ryan Motion**")

  (Dkt. 414); and
- (B) a Second Motion to Compel Debtor's Compliance with Rule 2004 Subpoena for Examination and Production of Documents (the "**Debtor Bundy Motion**") (Dkt. 424).

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

The Ryan Motion and the Debtor Bundy Motion (collectively, the "Motions") ask the Court to order Ryan Bundy, Bundy Motors Company, and Debtor Ammon E. Bundy (collectively, the "Witnesses") to comply with a deposition and document Subpoena issued by the St. Luke's Creditors pursuant to previously entered court orders under Rule 2004. The Motions also asks that the Witnesses be required to testify during oral examinations.

Copies of the Motions, and declarations submitted in support of the Motions as Dkts.

Nos. 415 and 425, had been previously served upon the corresponding Witnesses and are being served with this Notice. The Motions are also on file with the Court, and you can obtain a copy of the Motions or supporting documents through the Clerk's office or by contacting the attorneys for the St. Luke's Creditors at the addresses, emails or telephone numbers indicated above.

If you do not want the Court to grant the relief requested in either or both of the Motions, then you or your attorney must take the following two steps:

(1) On or before **June 23, 2025 (the "Objection Deadline")**, file with the Bankruptcy Court a written Objection to the Application explaining your position at:

United States Bankruptcy Court 350 South Main Street, Room 301 Salt Lake City, UT 84101 (if mailed)

or

United States Bankruptcy Court Orrin G. Hatch U.S. Courthouse 351 South West Temple, Rm. 1.100 Salt Lake City, Utah 84101 (if delivered in person)

If you mail your objection to the Bankruptcy Court for filing, it must be deposited in the U.S. Mail in sufficient time for it to be **received** by the Court **on or before the Objection Deadline**. You must also mail a copy to the undersigned counsel at:

**HOLLAND & HART LLP** 

Attn: Erik F. Stidham

222 S. Main Street, Suite 2200, Salt Lake City, UT 84101

Email: efstidham@hollandhart.com

(2) You must also attend the hearing on Wednesday, July 2, 2025 at 3:00 p.m. (the "Hearing"), before the Honorable William T. Thurman. The Hearing will be held via Zoom at ZoomGov.com/join Meeting ID: 160 7523 8590 Passcode: 9626637, Phone No. 1-669-254-5252. PLEASE NOTE THAT THE HEARING ON THE DEBTOR BUNDY MOTION WAS PREVIOUSLY SCHEDUELD ON JULY 15, 2025 AND HAS NOW BEEN MOVED TO WEDNESDAY JULY 2, 2025 AT 3:00 P.M., WHICH IS ALSO THE DATE AND TIME THE COURT WILL HEAR THE RYAN MOTION. Parties who wish to participate in the

hearing should consult the Bankruptcy Court's website at https://www.utb.uscourts.gov/court-hearings-be-conducted-zoom for the most up-to-date information regarding participation at a hearing.

Failure to attend the Hearing could be deemed a waiver of your objection. If you or your attorney do not appear at the Hearing, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motions and may enter an order grating the Motions.

DATED this 6th day of June, 2025.

HOLLAND & HART LLP

/s/ Erik F. Stidham
Erik F. Stidham (Admitted Pro Hac Vice)

HOLLAND & HART LLP, As local counsel

<u>/s/ Engels Tejeda</u> Engels Tejeda

Attorneys for St. Luke's Health System, St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2025, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user:

Mark C. Rose McKay, Burton & Thurman, P.C. Chapter 7 Trustee

trustee@mbt-law.com; UT32@ecfbis.com

Matthew J. Burne

U.S. Department of Justice

david.w.newman@usdoj.gov; matthew.burne@usdoj.gov;

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George B. Hofmann

Counsel for Chapter 7 Trustee

ghofmann@ck.law; mparks@ck.law

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by:

First Class U.S. Mail, with postage prepaid to:

Ammon Edward Bundy, pro se

P.O. Box 1062

Cedar City, UT 84721-0991

Ammon Edward Bundy

896 E 400 S

New Harmony, UT 84757

Ryan Bundy

361 Riverside Road

Mesquite, NV 89027-5905

**Bundy Motors Company** 

Attn: Ryan Bundy 361 Riverside Road

Mesquite, NV 89027-5905

And by electronic mail to:

Ammon Edward Bundy

aebundy@bundyfarms.com

aebundy@msn.com

Ryan Bundy

Bundy's Motors Company

bundymotors27@gmail.com

/s/ Engels Tejeda

Engels Tejeda

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